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February 16, 2018

Via ECF

Hon. Katherine B. Forrest
United States District Court
500 Pearl Street, Room 2230
New York, New York 10007-1312

**Re: *Ritchie v. Northern Leasing Systems, Inc. et al;*
No. 12-cv-4992 (KBF)**

Dear Judge Forrest:

This office represents Defendants Northern Leasing Systems, Inc., Lease Finance Group, LLC, Ricardo Brown, Robert Taylor, Joseph I. Sussman, Joseph I. Sussman, P.C., and Jay Cohen (“Movants”) in the above action. I am writing to provide the Court with a further update on the status of the bankruptcy case filed by Chittur & Associates, P.C. (“C&A”), Case no. 16-22075-rdd, United States Bankruptcy Court for the Southern District of New York, and its effect on the motion for sanctions filed by Movants (ECF No. 287) (the “Sanctions Motion”). That motion was administratively terminated and held in abeyance on December 14, 2017 pending the Court’s receipt of status reports from the parties. (ECF No. 330). Following receipt of my initial status report, the Court approved Movants request that the Sanctions Motion be held in abeyance until certain motions were decided in the Bankruptcy Court. (ECF No. 334).

As indicated in my January 24, 2018 status report (ECF No. 334), C&A filed a motion to voluntarily dismiss the C&A Bankruptcy on December 7, 2017. In Movants’ opposition to that motion, Movants requested either that the motion be denied or that the C&A bankruptcy case be converted from a case under Chapter 11 to one under Chapter 7 of the Bankruptcy Code. On February 13, 2018, the Bankruptcy Court (Hon. Robert D. Drain, U.S.B.J.) issued an order converting the C&A bankruptcy from Chapter 11 to Chapter 7 and appointed a Chapter 7 trustee. (copy enclosed).

On January 23, 2018, Movants filed a Motion For Relief From the Automatic Stay to permit Movants to liquidate their claim against C&A in this Court. That motion was originally returnable on February 13, 2018, but was adjourned to April 13, 2018.

Hon. Katherine B. Forrest
February 16, 2018
Page 2

Because Movants have not yet obtained relief from the automatic stay, Movants ask the Court to continue to hold the Sanctions Motion in abeyance until Movants' motion for relief from the stay in the C&A bankruptcy is decided by the Bankruptcy Court.

Respectfully submitted,

MOSES & SINGER LLP

/s/

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